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November 21, 2023

VIA ECF

The Honorable Mary Kay Vyskocil
U.S. District Court for the Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

RE: ***Danil Mazur, et al. v. UGS Herman, LLC***
Case No. 1:23-cv-08839-MKV

Dear Judge Vyskocil:

In light of Plaintiffs' decision not to file an Amended Complaint, Defendant's Motion to Dismiss Plaintiffs' Complaint is ripe for submission. Defendant's Motion is currently due by November 27, 2023. (ECF No. 12). Pursuant to Rule 2(G) of the Court's Individual Rules of Practice in Civil Cases, Defendant files this letter request for two week extension of time to file its Motion to Dismiss, until December 11, 2023. The reason for this extension request is to ensure Defendant has a meaningful opportunity to review the Motion to Dismiss in light of numerous individuals being out of office for the Thanksgiving holiday. This Defendant's first request for an extension.

Plaintiffs will not be prejudiced by this extension as they have already filed a request for an extension of time to respond to Defendant's Motion to Dismiss, with a proposed response date of January 2, 2024. As such, even with Defendant's proposed deadline of December 11, 2023 to file its Motion to Dismiss, Plaintiffs will still have over three weeks to file a response, which is over a week longer than is provided for in the Local Rules. Further, Plaintiffs' lead counsel has indicated that he will be out of the country through December 10, 2023, and as such will not face any delay as a result of Defendant's requested extension. Plaintiffs' counsel was contacted regarding this extension request and Plaintiffs' counsel has consented to this extension provided that the undersigned is agreeable to an extension of Plaintiffs' response date until January 12, 2024. As such, the parties request that the Court enter an Order amending the briefing schedule as follows:

Deadline for Defendant to file its Motion to Dismiss: December 11, 2023

Deadline for Plaintiffs to file Response to Motion: January 12, 2024

Thank you for your consideration of this matter.

Hon. Mary Kay Vyskocil
November 21, 2023

Respectfully Submitted,

OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.

By: /s/ Kelly M. Cardin

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cc: All counsel of record (by ECF)